

UNITED STATES DISTRICT COURT

for the
Central District of California

____ Division

FILED

CLERK, U.S. DISTRICT COURT

1/2/25

CENTRAL DISTRICT OF CALIFORNIA

BY ____ CS ____ DEPUTY

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xiaoxiaozhou

Case No. CV25-144-CBM(BFMx)

(to be filled in by the Clerk's Office)

*Plaintiff(s)**(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-v-

BINANCE HOLDINGS LIMITED, d/b/a
BINANCE.COM and
BAM TRADING SERVICES, INC., d/b/a BINANCE.US_____
*Defendant(s)**(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>XIAOXIAOZHOU</u>
Street Address	<u>903H BLK SUIYUAN XIAOQU GZ TIANHE TIANYANG R GUANG</u>
City and County	<u>GUANGZHOU GUANGDONG CHINA</u>
State and Zip Code	<u>GZ 510635</u>
Telephone Number	<u>+8613714998182</u>
E-mail Address	<u>xiazhou891@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	BAM TRADING SERVICES, INC.
Job or Title <i>(if known)</i>	
Street Address	One Letterman Drive,Building C,Suite C3-800
City and County	San Francisco, California USA
State and Zip Code	California 94129
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	BINANCE HOLDINGS LIMITED,
Job or Title <i>(if known)</i>	
Street Address	House of Francis,Room303,Ile Du Port,Mahe,Seychelles. #virtual
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Plaintiff xiaoxiao zhou brings this complaint against defendants Binance Holdings Limited ("Binance"), BAM Trading Services, Inc. ("BAM"), pursuant to the federal civil Racketeer Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. § 1962.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* XIAOXIAO ZHOU, is a citizen of the
State of *(name)* GUANGDONG CHINA.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) BAM TRADING SERVICES, INC., is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) San Francisco, California.
 Or is incorporated under the laws of (foreign nation) United States, and has its principal place of business in (name) San Francisco, California.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

1:My BINANCE account was registered on December 24, 2017.As shown in the figure 22,23 (22and23 are the same)

2:Before registering on Binance,I registered on other exchanges, later on , i transferred all other exchanges money into Binance,As shown in the figure 25 ,17,18,19, i once went to the bank to print the corresponding transaction records, the police also calculated the amount of money —+

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

My case is a new type of Internet crime case. Happening on the Internet,It also means that it can happen anywhere, But I was in CHONGQING CHINA, No office, no headquarters,unregulated BINANCE robbed me and then ignored it. . its registered address is a virtual address . I have personally visited the BINANCE registered address in Shanghai published on the Internet, and one is a ruin, and the other is a registered company shared by multiple companies, a virtual address.So I think that the BINANCE registered address in Seychelles is also a virtual address.

introduce

B. What date and approximate time did the events giving rise to your claim(s) occur?

1:Starts on July 12, 2021, Binance's participation in the extortion and robbery of the cryptocurrency assets that criminal stole from me, My decades of savings were forced to become part of the company's profits , Become one of their "contributions" to expanding their global business .

2:BINANCE acts as a bridge for all kinds of "thieves" without ID cards, and colludes with them for the purpose of money. Binance also receives generous fees for every transaction conducted on the Binance exchange, which brings hundreds of millions of dollars in illegal profits to Binance.Binance profited handsomely from its crimes, but federal prosecutors eventually

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*
- Binance users could store and trade value in the form of virtual assets, in accounts(or "wallets") maintained by Binance.when a user opened a Binance account,Binance assigned them a custodial virtual currency wallet-i.e.,a wallet in Binance's custody that allowed the user to conduct transactions on the platform ,including transferring funds to other Binance users or accounts or to external virtual currency wallets.
- Before the summer of 2021, I transferred all my savings Irregular and continuous to the BINANCE ,Become a BINANCE user .Conduct virtual currency investment transactions,At that time, the main purchase was the token "BNT""ETH",Then I changed to "ETH" "BNB"and transferred it to the external virtual currency wallet: TP wallet. After a series of transactions and conversions, before the incident, I had 305827625 Piece RACA,374168631 Piece FLOKI,Matrix Plus Box #607 and #787,During this transaction, I actually kept transferring my income to BINANCE, and then to TP, and kept buying +

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

In response to media interviews, the former chief strategy officer pretended to be innocent and defended that Binance had grown rapidly and was initially a company run by software engineers who were unfamiliar with the laws and regulations established to address bribery and corruption, money laundering and economic sanctions risks. But If there is an error in the system application, it is not a big deal because you can correct it or find other options. However, when Binance is robbed, people lose money that they have saved for decades and suffer from long-term PTSD.

Over the years, BINANCE have tried every possible means to evade regulation, win over public opinion, and choose to turn a blind eye to the weak voices. Because BINANCE is not regulated, it has flouted the law, persecuted, robbed, and defrauded the weak. At the age of 38, I was robbed of everything by BINANCE, who was wearing the cloak of blockchain. BINANCE had no intention of returning the money or admitting its mistakes. I should have become a mother that year, but I do not only miss out on the next trading opportunity and profit , In +

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

BINANCE extortion, fraud and robbery caused me to miss out on trading losses, <But-for test> I will reap this profit in the winter of 2021
 305827625(raca) \$3135467
 374168631(floki) \$131219
 Matrix plus Box #787 #607 \$160000
 My trading loss \$3426686

Wherefore, Plaintiffs xiaoxiao zhou pray for the following relief:

- 1:Order the defendant compensation for my trading losses \$3426686
- 2 : Secondly, the mental torture it has caused me for many years is far greater than my trading losses. According +

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/02/2025

Signature of Plaintiff xiaoxiao zhou
Printed Name of Plaintiff xiaoxiao zhou

B. For Attorneys

Date of signing: _____

Signature of Attorney _____
Printed Name of Attorney _____
Bar Number _____
Name of Law Firm _____
Street Address _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____